



December 16th, 2015

Mr. Steve Morasch, Chair
Clark County Planning Commission
Clark County Community Planning
PO Box 9810
Vancouver, Washington 98666-9810

Dear Chair Morasch and Planning Commission Members,

Subject: Comments on the proposed Rural Industrial Land Bank for the Planning Commission's December 17th, 2015 Public Hearing.

Thank you for the opportunity to comment on the proposed Rural Industrial Land Bank. **We respectfully urge the Planning Commission to recommend denial of the Rural Industrial Land Bank.**

We lose almost an acre of farmland every minute in the United States. American Farmland Trust works to prevent conversion of this precious resource by supporting policies to protect farmland from development. Maintaining our agricultural land base is critical to feeding our growing population and to providing the ecosystem services required for a healthy environment. Once farmland is paved over for development, we can never get it back. Our members come from all over Washington State, including Clark County.

The agricultural economy is significant in Clark County. In 2012, the market value exceeded \$50 million. However, we are seeing a decrease in the number of farms and the land in farms (decrease of 8% and 5% respectively from 2007 to 2012).¹ **The proposed Rural Industrial Land Bank is a step in the wrong direction. It would result in the loss of even more farmland.**

According to *Addendum B: Agricultural Land Analysis*, 99% of the proposed site contains prime soils. Prime farmland soils have the best physical and chemical properties for most kinds of agriculture, requiring less water, fertilizers, and pesticides. They are the easiest soils to keep healthy, farm profitably, and grow the widest variety of crops with the least environmental impact. These soils are a limited natural resource; they cannot be replaced. Furthermore, The *Clark County Buildable Lands Report* found that the County's urban growth areas have sufficient land to accommodate the County's planned employment growth. It does not make sense, nor does it follow the intent of the Growth Management Act, to convert land that is actively being farmed to industrial use. **We urge the Planning Commission to recognize that this land has properties that make it particularly well suited for agricultural use and that it deserves to maintain its current designation. Please deny the proposed Rural Industrial Land Bank.**

Thank you for your consideration. Please do not hesitate to contact us via telephone 206-860-4222 or e-mail kdelavan@farmland.org if you have any questions.

Sincerely,

Heidi Eisenhour
Regional Director

Kate Delavan
Policy and Planning Manager

¹ USDA (2012). *2012 Census of Agriculture County Profile, Clark County, Washington*